

EXHIBIT 6

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
UBER TECHNOLOGIES, INC.;)	17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)	
)	
Defendants.)	

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION OF JENNIFER HAROON

San Francisco, California

Wednesday, July 26, 2017

Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

Job No. 2664313

PAGES 1-222

1 Q And do you recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:17:56
4 A I don't. I mean -- yeah. 05:17:59
5 Q Is it fair to say it would have been 05:18:06
6 whatever [REDACTED] 05:18:07
7 A That's -- 05:18:10
8 MS. BAILY: Object to form. 05:18:10
9 A -- fair to say. Sorry. That's likely. 05:18:11
10 Q Okay. Is there a possibility that there 05:18:14
11 would have been [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:18:22
13 MS. BAILY: Object to form. 05:18:26
14 A [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 05:18:53
21 Q Do you recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:18:59
23 MS. BAILY: Object to form. 05:19:00
24 A I don't -- I mean, what would you 05:19:04
25 describe -- what would you call significant? 05:19:13

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05:20:35

1 A No.

2 Q Okay. [REDACTED]

05:20:43

4 A That's correct.

05:20:48

5 Q Who in the self-driving team was the --

05:20:48

6 within the self-driving team, was there a principal

05:20:50

7 point of contact with [REDACTED]

05:20:53

8 A I would say Chris.

05:21:01

9 Q Anybody else?

05:21:04

10 A Myself.

05:21:05

11 Q And then who were your contacts --

05:21:11

12 contacts at [REDACTED]

05:21:13

13 A So the primary -- the lead was a gentleman

05:21:21

14 named [REDACTED]. And I can't remember his last name. And

05:21:23

15 I don't remember the name of his team members.

05:21:28

16 Q Do you remember anybody else from [REDACTED]

05:21:31

18 A No. There were at least two other people.

05:21:32

19 Q Okay. And can you describe what -- what

05:21:37

20 [REDACTED] did as part of this process?

05:21:47

21 A So you know, [REDACTED]

05:22:12

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 05:22:54
9 Q Okay. Do you recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:23:07
11 A I don't recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] 05:23:28
15 Q Do you recall any others? 05:23:39
16 A Not off the top of my head. 05:23:43
17 Q How was [REDACTED] 05:23:44
18 MS. BAILY: Object to form. 05:23:45
19 A [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
24 Q And by [REDACTED] [REDACTED]
[REDACTED] [REDACTED]; is that correct? 05:24:15

1 [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] 05:26:14
9 Q And so as a result of all this work, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] 05:26:31
13 MS. BAILY: Object to form. 05:26:33
14 A I don't -- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] 05:26:56
18 Q Do you recall [REDACTED]
[REDACTED] 05:27:00
20 MS. BAILY: Object to form. 05:27:02
21 A I don't remember [REDACTED]
[REDACTED]
[REDACTED]
24 THE COURT REPORTER: Did you say "[REDACTED]
[REDACTED] B? 05:27:25

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1 A [REDACTED] 05:27:27

2 Q (BY MR. TAKASHIMA) What methodology did 05:27:29

3 the Google side use to [REDACTED] 05:27:31

4 MS. BAILY: Object to form. 05:27:37

5 A In the meetings that I had with them, [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 05:28:47

19 Q Do you recall [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 05:28:49

21 A I don't remember [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]. 05:29:01

24 Q Do you recall any others? 05:29:02

25 A Unfortunately not. 05:29:04

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05:31:38

05:31:46

05:31:57

05:32:00

05:32:09

05:32:14

05:32:17

05:32:18

05:32:20

05:32:27

05:32:31

05:32:33

05:32:36

05:32:37

05:32:39

05:32:39

05:32:41

05:32:50

05:33:01

05:33:12

05:33:13

05:33:15

1 A On the Waymo side, John Krafcik and our
2 CFO, Ger, once he had joined. And Kevin Vosen, our
3 GC, once he had joined. And in the beginning,
4 myself and Anne Widera on my team.

5 Q Anybody else?

6 A Not that I can think of.

7 Q Okay. And then on the -- the Google or
8 Alphabet side?

9 A [REDACTED] And there
10 were other members of the Corp dev team, but I don't
11 remember their names.

12 Q Again, was [REDACTED] running day-to-day on the
13 Google side?

14 MS. BAILY: Object to form.

15 A Yes.

16 Q Okay. And who was handling the day-to-day
17 on the Waymo side?

18 A I would say that would be our CFO.

19 Q Okay. [REDACTED]

[REDACTED]
[REDACTED] [REDACTED], no.

22 Q Okay. Do you know [REDACTED]

[REDACTED]
24 MS. BAILY: Object to form.

25 A I do not.

1 Q Do you know what [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:33:18

3 MS. BAILY: Object to form. 05:33:20

4 A I do not. 05:33:21

5 Q Okay. Do you know what [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:33:23

7 A I do not. 05:33:24

8 Q Okay. And you said that -- I believe 05:33:25

9 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] is that correct? 05:33:31

11 A No. That was it -- 05:33:33

12 Q Okay. 05:33:34

13 A -- [REDACTED] 05:33:34

14 Q [REDACTED] 05:33:35

15 A That's right. 05:33:41

16 Q Okay. 05:33:41

17 MR. TAKASHIMA: Okay. That concludes my 05:34:07

18 questioning, and I will pass it to counsel for Otto 05:34:08

19 trucking. 05:34:14

20 EXAMINATION BY COUNSEL FOR THE DEFENDANT 05:34:15

21 BY MR. JENNINGS: 05:34:33

22 Q I just have a few questions. I'll keep 05:34:44

23 this pretty short. Going back to our conversation 05:34:46

24 about the Chauffeur Award -- I think it was in 05:34:48

25 Exhibit 1137 -- I don't know if you'll need to refer 05:34:51

1 I, MARY J. GOFF, CSR No. 13427, Certified
2 Shorthand Reporter of the State of California,
3 certify;

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth, at
6 which time the witness declared under penalty of
7 perjury; that the testimony of the witness and all
8 objections made at the time of the examination were
9 recorded stenographically by me and were thereafter
10 transcribed under my direction and supervision; that
11 the foregoing is a full, true, and correct
12 transcript of my shorthand notes so taken and of the
13 testimony so given;

14 That before completion of the deposition,
15 review of the transcript () was (XX) was not
16 requested: () that the witness has failed or
17 refused to approve the transcript.

18 I further certify that I am not financially
19 interested in the action, and I am not a relative or
20 employee of any attorney of the parties, nor of any
21 of the parties.

22 I declare under penalty of perjury under the
23 laws of California that the foregoing is true and
24 correct, dated this 27th day of July, 2017.

25 

MARY J. GOFF, CSR No. 13427